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Counsel to Export Development Canada

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

-----X  
In re: : Chapter 11  
:   
CIRCUIT CITY STORES, INC., et al., : Case No. 08-35653  
:   
Debtors. : Jointly Administered  
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**ORDER RESOLVING DISCOVERY DISPUTE BETWEEN EXPORT  
DEVELOPMENT CANADA AND THE DEBTORS**

THIS MATTER having come before the Court upon the request by the Circuit City Stores, Inc., et al. (the "Debtors") at a hearing held before this Court on December 7, 2009 to resolve the discovery disputes between Export Development Canada ("EDC") and the Debtors relating to discovery propounded by the Debtors on EDC regarding the Motion for Allowance of the Late Filed Administrative Expense Claim of Export Development Canada.

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**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:**

1. EDC is to provide the Court, on or before December 14, 2009, with a copy of the insurance contract and application for payment regarding TechCraft, which the Court shall review in camera to determine the sensitivity of the information contained in such documents, and to further determine whether it is appropriate for those documents to be turned over to the Debtors under the protection of an order preventing the disclosure of these documents to any party other than counsel for the Debtors pursuant to their discovery requests.

2. EDC is to provide counsel with all written communication between EDC and TechCraft Manufacturing, Inc. that is not subject to a privilege, privacy laws of Canada or the U.S., or the Export Development Act, in which case a privilege log must be completed cataloging those protected communications.

3. EDC is to provide counsel, through amendment to EDC's responses to the debtor's first set of interrogatories, protocols and procedures EDC utilizes in the handling of U.S. Bankruptcy case notifications involving an insured, if any exist, and any documents related to those protocols and procedures that are not subject to a privilege, privacy laws of Canada or the U.S., or the Export Development Act, in which case a privilege log must be completed cataloging those protected documents.

Dated: December\_\_\_\_\_, 2009

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**HONORABLE KEVIN R. HUENNEKENS  
UNITED STATES BANKRUPTCY JUDGE**

WE ASK FOR THIS:

/s/ Richard I. Hutson

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AND

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**Certificate of Service**

I hereby certify that on December 11, 2009, a copy of the foregoing was filed electronic mail on the following: (i) the Core Group, which includes the Debtors, co-counsel to the Debtors, the Office of the United States Trustee, co-counsel for any committee, counsel to the agents for the Debtors' pre-petition lenders, and counsel to the agents for the Debtors' post-petition lenders; (ii) the 2002 List; and (iii) those additional parties as required by the Case Management Order (all of which are defined in the Case Management Order).

/s/ Ronald A. Clifford